

EXHIBIT 1

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN

S&S INNOVATIONS CORP.,
A Colorado Corporation,

Case No. 18-cv-01377

Honorable Paul L. Maloney

Plaintiff,

v.

UUSI, LLC, d/b/a Nartron, a Michigan
Limited Liability Company, TATTLER
HOME PRODUCTS, LLC, a Michigan
Limited Liability Company, and NORMAN
RAUTIOLA, an individual.

**PLAINTIFF'S FIRST SET OF
REQUESTS FOR ADMISSIONS TO
DEFENDANTS**

Defendants.

Plaintiff, through its counsel, Kuiper Kraemer PC and Oppenhuizen Law PLC, submits the following Requests for Admissions Pursuant to Fed. R. Civ. P. 36. Each matter as to which a Request has been made shall be deemed admitted unless a response is served within 30 days as required by Fed. R. Civ. P. 36.

DEFINITIONS

1. For purposes of these discovery requests, the term "Tattler trademark" refers to the word "Tattler" which is a federally registered trademark owned by Plaintiff, Registration No. 5787373.
2. For purposes of these discovery requests, the term "Tattler Reusable Canning Lids logo" refers to Plaintiff's United States Trademark Registration No. 4005734, for the mark as shown below.



REQUEST FOR ADMISSIONS DIRECTED TO DEFENDANTS

1. Admit that the reusable canning lids returned from Colorado had the Tattler trademark on them.

RESPONSE:

2. Admit that the reusable canning lids returned from Colorado had the Tattler Reusable Canning Lids logo on them.

RESPONSE:

3. Admit that the product packaging for the reusable canning lids returned from Colorado had the Tattler trademark on them.

RESPONSE:

4. Admit that the product packaging for the reusable canning lids returned from Colorado had the Tattler Reusable Canning Lids logo on them.

RESPONSE:

5. Admit that the molds for the reusable canning lids returned from Colorado include the Tattler trademark such that "TATTLER" is molded onto each lid formed by the molds.

RESPONSE:

6. Admit that the molds for the reusable canning lids returned from Colorado have the Tattler Reusable Canning Lids logo on them.

RESPONSE:

7. Admit that Tattler Home Products and/or Uusi, LLC d/b/a Nartron ("Nartron") has only manufactured reusable canning lids using the molds delivered from Colorado.

RESPONSE:

8. Admit that Tattler Home Products and/or Nartron sells, or has sold, the reusable canning lids returned from Colorado that have the Tattler trademark on them.

RESPONSE:

9. Admit that after May 2014, Tattler Home Products and/or Nartron sold the reusable canning lids returned from Colorado that have the Tattler trademark on them.

RESPONSE:

10. Admit that after May 2014, Tattler Home Products and/or Nartron sold reusable canning lids that have the Tattler trademark on them.

RESPONSE:

11. Admit that after May 2014, Tattler Home Products and/or Nartron sold reusable canning lids in product packaging that bears the Tattler trademark.

RESPONSE:

12. Admit that after May 2014, Tattler Home Products and/or Nartron sold reusable canning lids in product packaging that bears the Tattler Reusable Canning Lids logo.

RESPONSE:

13. Admit that all reusable canning lids sold by Tattler Home Products and/or Nartron have the Tattler trademark on them.

RESPONSE:

14. Admit that Tattler Home Products and/or Nartron sells, or has sold, the reusable canning lids returned from Colorado that have the Tattler Reusable Canning Lids website address (www.reusablecanninglids.com) on them.

RESPONSE:

15. Admit that Tattler Home Products and/or Nartron sells, or has sold, the reusable canning lids that have the Tattler Reusable Canning Lids website address (www.reusablecanninglids.com) on them.

RESPONSE:

16. Admit that Tattler Home Products and/or Nartron utilizes, or previously utilized, product packaging for the sale of reusable canning lids that has the Tattler trademark on them.

RESPONSE:

17. Admit that Tattler Home Products and/or Nartron utilizes, or previously utilized, product packaging for the sale of reusable canning lids that has the Tattler Reusable Canning Lids logo on them.

RESPONSE:

18. Admit that Tattler Home Products and/or Nartron continue to use the Tattler trademark in the course of its business.

RESPONSE:

19. Admit that Tattler Home Products and/or Nartron continue to use the Tattler Reusable Canning Lids logo in the course of its business.

RESPONSE:

20. Admit that Tattler Home Products and/or Narton does not have the consent of S&S Innovations Corp. to use the Tattler trademark.

RESPONSE:

21. Admit that Tattler Home Products and/or Narton does not have the consent of S&S Innovations Corp. to use the Tattler Reusable Canning Lids logo.

RESPONSE:

22. Admit that Loren Stieg is not a member or employee of any kind to Tattler Home Products.

RESPONSE:

23. Admit that Loren Stieg is not a member or employee of any kind to Nartron.

RESPONSE:

24. Admit that Norman Rautiola did not have the consent of S&S Innovations Corp. to form Tattler Home Products.

RESPONSE:

25. Admit that Norman Rautiola did not have the consent of Loren Stieg to form Tattler Home Products.

RESPONSE:

26. Admit that Norman Rautiola and/or Nartron do not have the consent of Loren Stieg and/or S&S Innovations Corp. to operate Tattler Home Products and to sell useable canning lids by using the Tattler trademark and Tattler Reusable Canning Lids logo.

RESPONSE:

27. Admit that the Tattler Home Products website (www.tattlerproducts.com) contains the Tattler trademark.

RESPONSE:

28. Admit that the Tattler Home Products website (www.tattlerproducts.com) contains the Tattler Reusable Canning Lids logo.

RESPONSE:

29. Admit that no consent was obtained from S&S Innovations Corp. to permit the use of the Tattler trademark in the Tattler Home Products website (www.tattlerproducts.com).

RESPONSE:

30. Admit that no consent was obtained from S&S Innovations Corp. to permit the use of the Tattler Reusable Canning Lids logo in the Tattler Home Products website (www.tattlerproducts.com).

RESPONSE:

31. Admit that Loren Stieg, as majority owner of S&S Innovations Corp., previously objected to Defendants' use of the Tattler trademark.

RESPONSE:

32. Admit that Loren Stieg, as majority owner of S&S Innovations Corp. previously objected to Defendants' use of the Tattler Reusable Canning Lids logo.

RESPONSE:

33. Admit that the images from the Tattler Home Products website were copied from S&S Innovations Corp.'s website (www.tattlerproducts.com).

RESPONSE:

34. Admit that Loren Stieg is not, and never has been, a named account holder on bank account set up by Nartron for Tattler Home Products.

RESPONSE:

35. Admit that Defendants remain in possession of the molds returned from Colorado that have the Tattler trademark on them.

RESPONSE:

36. Admit that Defendants remain in possession of equipment, including the molding machines, returned from Colorado that are owned by S&S Innovations Corp.

RESPONSE:

Dated: June 16, 2020

KUIPER KRAEMER PC
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Dated: June 16, 2020

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